## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WISCONSIN

ESTATE OF MARY J. WOBSCHALL, BY SPECIAL ADMINISTRATOR, RONALD I. WOBSCHALL,

Plaintiff,

v.

Case No. 19-CV-1796

DAVE ROSS, et al.,

Defendants.

## MOTION TO DISMISS AMENDED COMPLAINT

TAKE NOTICE that the defendants, by their attorneys, Wisconsin Attorney General Joshua L. Kaul, Assistant Attorney General Rachel L. Bachhuber, and Assistant Attorney General Jeffery Simcox, hereby move the Court, pursuant to Fed. R. Civ. P. 12(b)(6), for an Order dismissing the plaintiff's claims. The grounds for this motion are set forth in the accompanying brief.

Dated this 23rd day of January, 2020.

Respectfully submitted,

JOSHUA L. KAUL Attorney General of Wisconsin

s/ Rachel L. Bachhuber RACHEL L. BACHHUBER Assistant Attorney General State Bar #1052533

JEFFERY A. SIMCOX Assistant Attorney General State Bar #1116949

Attorneys for Defendants

Wisconsin Department of Justice Post Office Box 7857 Madison, Wisconsin 53707-7857 (608) 266-0188 (Bachhuber) (608) 266-3861 (Simcox) (608) 267-8906 (Fax) bachhuberrl@doj.state.wi.us simcoxja@doj.state.wi.us